From:	Barbara Lett
To:	Vakoc, Misha
Cc:	christopher.larsen@mail.house.gov; Jennifer@wclt.org; ""jessica@wclt.org.""@domain.invalid; (b) (6) (b) (6) (b) (6) (b) (6)
Subject:	Letter to the EPA re: Permit #WAS026611
Date:	Wednesday, November 13, 2019 8:47:55 PM
Attachments:	Letter to EPA (3).docx LETTERS TO THE EDITOR PFASs.docx WETLAND EVALUATION.docx

Hello Misha,

Attached, you will find my comment in **Letter to the EPA re: Permit #WAS026611, Applicant Department of the Navy, Naval Air Station Whidbey Island**

Letters to the editor is in reference to publications in the Whidbey New Times.

The attached Wetland Evaluation are the Dugualla references from this Island County report:

https://www.govinfo.gov/content/pkg/CZIC-gb625-w2-i85-1986/html/CZIC-gb625-w2-i85-1986.htm

I'm sure that there are more recent ones as we are in association with the Whidbey Camano Land Trust:

https://www.wclt.org/western-toads-symbol-restoration-success-dugualla-preserve/

https://www.wclt.org/projects/dugualla-preserves/

https://www.wclt.org/projects/dugualla-heights/

We are hopeful that we will continue to have a habitat that flourishes and is environmentally safe,

Respectfully,

Barbara Lett

Cc: Rick Larsen, Congressman, 2nd District
Jennifer Hajney, Whidbey Camano Land Trust
Jessica Larson, Whidbey Camano Land Trust
(b) (6) Oak Harbor, WA 98277
(b) (6) Oak harbor, WA, 98277
(b) (6) Oak Harbor, WA 98277

Additional References:

https://www.epa.gov/aboutepa/epa-washington

https://www.epa.gov/aboutepa/epa-region-10-pacific-northwest

https://ecology.wa.gov/

https://ecology.wa.gov/About-us/How-we-operate/Partnering-with-the-EPA

https://www.seattletimes.com/seattle-news/inslee-ferguson-denounce-epa-move-to-ease-water-standards-for-washington-state/

http://komonews.com/news/local/epa-proposes-rolling-back-water-quality-standards-in-wash-wants-to-hear-from-public

https://pugetsoundkeeper.org/2019/08/27/take-action-help-us-stop-epa-from-rolling-back-washingtons-water-quality-standards/

https://www.epa.gov/pfas/basic-information-pfas

https://www.epa.gov/pfas

https://www.niehs.nih.gov/health/topics/agents/pfc/index.cfm

- http://www.health.ri.gov/water/about/pfas/
- https://toxicfreefuture.org/key-issues/chemicals-of-concern/pfas-nonstick-nightmare/
- https://www.martenlaw.com/newsletter/20170309-emerging-contaminants-uncertainty
- https://www.courthousenews.com/wp-content/uploads/2019/02/epa-action-plan.pdf
- https://www.epa.gov/superfund/what-superfund
-

U.S. EPA Region 10
Attn: Director, Water Division
1200 Sixth Avenue, Suite 155 (WD-19-C04)
Seattle, Washington 98101

Barbara Lett
(b) (6)
Oak Harbor, Washington 98277
November 12, 2019

We just picked up the newspaper yesterday and read about the EPA permit proposal to allow the NAS Whidbey to discharge storm water runoff into **Clover Valley Creek and Dugualla Bay**. A permit that allows the Navy to allow storm water with possible toxic and persistent chemicals is very concerning to the residents of Dugualla Bay Heights Community. Between the runways, our homes and bay is farmland: strawberries, blueberries, pumpkins, corn, a farm stand with produce, ice cream, activities for adults and children, cattle, goat farm, personal gardens and an abundant estuary filled with birds (heron, hawks, eagles, pileated woodpeckers, hummingbirds and many others), waterfowl, deer, frogs, mice and other small animals that support the food chain. We live in a beautiful, **nature filled estuary** where we, our families and pets actively live, play, grow and harvest the food that we consume (along with personal gardens, we harvest crabs in the bay in front of our homes and fish just a bit further out; they hunt for ducks in the Clover Valley water by the Dike road. Hunters, family pets and hunting dogs are regularly exposed to these waters). Many of us avoid harmful chemical runoff by hand digging our weeds and composting; **we eat from these waters**. It is unthinkable to take this place for granted, irreversibly disrupt our beautiful ecosystem, contaminate our bodies and leave a persistently toxic environment as a legacy for our children's children… In addition to environmental and quality of life concerns, we have very real concerns for our property values and resale issues. **This is a big deal for us**.

After a bit of internet searching, we realized that with the comment period ending 11/14/19, we have little time to research the complexities of storm water runoff in two days; we really have to **put our faith in the EPA's duty to protect us** and the Navy's good will and honor in doing the right thing for the community that supports it. We must adhere to strict shore management regulations. At the very least, **we ask you not to allow toxic/persistent chemical runoff, frequently and routinely monitor runoff for chemicals and provide remedy if failure results in contamination (Superfund).**

https://www.epa.gov/npdes-permits/proposed-stormwater-permit-naval-air-station-whidbey-island-washington

Dugualla Bay supporting references are contained in this document:

https://www.govinfo.gov/content/pkg/CZIC-gb625-w2-i85-1986/html/CZIC-gb625-w2-i85-1986.htm

Thank you for your thoughtful consideration,

Respectfully,

Barbara Lett

(b) (6)

LETTERS TO THE EDITOR

Letter: Congress should ban PFAS in firefighting foam

- Friday, November 1, 2019 4:15pm
- LETTERS TO THE EDITOR

Editor,

Recently I attended an informative meeting hosted by the local greening congregations concerning drinking water. I learned that firefighting foam containing toxic PFAS chemicals has contaminated drinking water in our state, including here on Whidbey Island.

It's been three years since the discovery of the contamination and some residents are still on bottled water waiting for the Navy to switch their homes to the public water supply. Meanwhile, the Navy and military bases across the country are still using PFAS firefighting foam. I learned that dozens of airports around the world, both military and civilian, are using florine-free foam with great success.We urgently need Congress to put an end to the military use of the PFAS foams to prevent any more drinking water contamination, especially since there is a practical alternative. More specific information can be found at *toxicfreefuture.org.*

Right now, the U.S. Congress is negotiating a final version of the National Defense Authorization Act (NDAA), the bill that funds the U.S. military. This year a number of amendments have been proposed to address PFAS pollution. Congressman Rick Larsen, representing Whidbey Island, is one of the negotiators. On behalf of all the community members across Whidbey Island who are facing health concerns and drinking water contamination, I urge Congressman Larsen to put public health first and press for the final NDAA to contain strong provisions addressing PFAS. Specifically, the NDAA should require the military to phase out PFAS foams as soon as possible, and add PFAS as a hazardous substance to the Superfund law, which will require that contaminated sites like Coupeville are promptly cleaned up.

(b) (6)

Freeland

Letter: Navy withheld info on water contamination

- Friday, November 1, 2019 4:14pm
- LETTERS TO THE EDITOR

Editor,

The Navy found PFAS chemicals in water coming from its base more than a year ago – but didn't reveal all that were found. Neither did it disclose that it knew, nine months ago, PFASs had seeped to portions of the aquifer.

In October of last year, the Navy announced that two PFASs had been found in Clover Valley Creek and Lake. However, it was not until October 2019, a year later, that reports were posted on a Navy website showing that six PFASs had actually been found — in every monthly sample from September 2018 to September 2019.

PFAS chemicals don't break down but accumulate in the body and are linked to health problems, including cancer. There are 114 properties in the Clover Creek and Lake area where water is still used for irrigating and, until news of contamination, watering cattle. The Creek and Lake empties to Dugualla Bay and a salmon restoration area.

The two PFASs the Navy first admitted to finding in the surface water were, PFOA and PFOS. But, also found, in every sample taken from September 2018 through September 2019 were PFHXS, PFHXA, PFHPA, and PFBS—the same "forever chemicals" found in Coupeville's drinking water now being filtered at the Navy's expense.

The Navy has been quick to say that contaminated surface water doesn't mean groundwater is contaminated. But buried within the Navy's websites are summaries of test results from January 2019 showing the contamination of three Clover Creek area wells with PFOA, PFHXS and/or PFBS. The most contaminated well owner didn't receive results until October 21, 2019.

Withholding such information denies people opportunities to protect themselves. They could avoid exposures, ask for cleanup, or insist that the Navy replace PFAS containing firefighting foams that caused the contamination.

Most wells sampled don't show contamination, but all wells haven't been sampled and PFASs are still seeping to the aquifer—and still discharging to Dugualla Bay and the Straight of Juan DeFuca, public waters classified by the state as "extraordinary" for aquatic life uses, protected shellfish harvesting, and threatened and endangered species.

Rick Abraham

Greenbank

Letter: Permit would allow Navy to discharge chemicals

- **Friday, November 8, 2019 1:42pm**
- **LETTERS TO THE EDITOR**

Editor,

The EPA has proposed a stormwater discharge permit for Navy discharges to Clover Valley Creek and Dugualla Bay.

The EPA acknowledges that the proposed permit was prepared without knowledge of the PFAS contaminated discharges.

Ironically, the proposed permit calls on the Navy to educate the public about "resident killer whales" — but it doesn't require monitoring for the PFASs that are known to accumulate in marine mammals and fish.

The public comment period ends Nov. 14, much of it having passed without the public knowing about the PFASs.

Rick Abraham

UpperLeftCoast • 5 days ago

These are called "forever" chemicals because they do not occur anywhere in nature, are bioaccumulative, and simply don't break down under any sort of natural conditions. This family of chemicals have been linked to numerous health problems and there does not appear to be any safe level of exposure.
I fault the any for:
1) Not disclosing the test results;
2) Not immediately informing the affected people and providing them with alternative water;
3) Not beginning planning to clean up the source of the contamination, including the addicted aquifers;
4) Persisting in retaining stockpiles of the firefighting foam that is the ultimate source of the contamination. The EU has now completely switched to fire fighting foams that do not contain this class of chemicals.

WETLAND EVALUATION #IS 3-1 (Dugualla Bay)

LOCATION: (b) (6)

(b) (6)

WETLAND CHARACTERISTITICS AND EVALUATION: See attachments.

1. Dugualla Bay and Marsh (Site #4) Whidbey Habitat gtMgy --@ prepared by the Soil Conservation Service and the Washington State Department of Game, 1979.

2. Dugualla Bay -- prepared by Linda Phillps, Sponsored by the U.S. Corps of Engineers, Wetland Plants of the Snohomish Estuary Delta and Dugualla Bay, Whidbey Island., September, 1977.

SITE # 4: Dugualla Bay and Marsh

APPROX. ACREAGE: 50

HABITAT: Rich farmlands interspersed with march and brush lands, large brackish lake, and tidal mud flats.

ACCESSIBILITY: Easily accessible by foot from main highway (525), Frostad Road or Dugualla Dike Road.

VALUE: CRITICAL. Principle waterfowl resting/feeding marsh servicing north end of Whidbey. Great numbers of stickleback and smaller fish hatch here. These provide food source for larger food fish more valued by man. Salmon also spawn in this area. Dugualla Lake is rich in nutrients, and grows a huge rainbow trout. Aside from waterfowl, a great variety of raptors and shorebirds inhabit the site. Pheasant and quail propagate and inhabit area year round, and red fox, raccoon and muskrat, valued for their fur, are common here. Area is heavily used and enjoyed by public. One of few sites visited by cutthroat on Whidbey.

USE: HEAVY USE. Area on either side farmed to edge of pond. Site is used by trout fishermen spring through early fall, by trappers going after muskrat, raccoon and fox in the fall and winter months, and by duck and pheasant hunters during the open seasons. Summer sees the lake often used for minihydroplane racing.

LIFE FORMS NOTED AT SITE:

Waterfowl:

Widgeon	Scaup
Greenwing teal	Bufflehead
Pintails	Goldeneye
Mallards	Ruddy ducks
Gadwalls	Coots

(and many other species in lesser numbers)*

*visited annually by a few whistling swan and an occasional trumpeter.

Other Bird Life Noted:

Marsh hawks	Mew gull
Red-tailed hawk	Bonapartes gull
Kestrel	Cormorants (3 species here)
Barn owl	Loons (common & Arctic noted here
Great horned owl	Western grebe
Killdeer	Chinese pheasant
Long-billed curlew	California quail
Spotted sandpiper	Reeves pheasant
Greater yellowlegs	Swallows (barn, cliff & violet-green)
Sanderlings	Sparrows (many types)
Western sandpiper	Great blue heron
Glaucous-winged gull	Bald eagle
Herring pull	

Site 4: Dugualla bay and Marsh (con't)

Cther Wildlife Noted:

Raccoon	Dungeness crabs
Red box	Rainbow trout
Muskrat	Cutthroat trout
Deer mice	Weasel
Garter snake	

ly2ical Site Vegetation:

Gumplant	Catseye
Mustard	Yarrow
W11d rose	Thistle

Fir	Alfalfa
Alder	Wheat
Hemlock	Corn
Beach pine	Raspberry (black cap)
Red clover	A few apple trees
Cattails	
Salt grass	

SuME INTERESTINF FIELD N(9ES:

Ubservations on August 3, 1977 and again on (-@ctober 4, 1977

"Dugualla Bay has blessed me with some rare wildlife vignettes. Many hundreds of times I have noted blue herons "fishing." But on Aug. 3, 1977, 1 saw a great blue heron nail and fly off with a garter snake. On Sept. 29, 1977, 1 vitnessed another blue heron posed for a strike In the wheat stubble. Suddenly his head darted dc)wn, and he came up with a field mouse that he promptly ate.

@-,n another occasion after a high tide the shore along the mud flats was strewn with the bodies of literally thousands and thousands of dungeness crabs. all of the same size. I never did find out what killed them. They were not mo.Ited shells, but intact crabs.

-1h early August I checked and weighed a 3-3/4 1b. rainbow trout caught in @jugualla Lake. 1 also saw pictures of a 5 1b. rainbow taken here earlier in the summer. A common complaint though from fishermen was that though the fish were large, they tasted like JP5 fuel, and when cooking the smell was sometimes so

strong their wives were reluctant to cook the fish. Uil and fuel leakage into thIs ecosystem from adjoining Naval Air Station has been an occasional problem.

In early December I had just checked a trapper by the name of (b) (6), and he walked over to reset a muskrat trap in Dugualla Lake. he had just set the trap wheiz a muskrat swam into the trap underwater and was caught fast. Needless to say, it scared the hell out of the unexpecting trapper who was still holding onto the chain when the rminkrat bit."

from the field notes of Wildlife Agent Anthony de la Torre

Ougualls Bay and Dike

Dugualla Lake and Marsh

"We have had covies of quail and Chinese pheasant here for years. Somet imes they'll come right into the yards and feed and we hear them other days in the brush and berry bushes. This Is one of the few places on the north end that.. has carried nesting populations through the years."

(b) (6), residents at Dugualla hay

Dugualla Bay

Dugualla Bay is located on the east shore of Whidbey island north of the Naval Air Station at Oak Harbor. The land was identified as a wetland which is periodically flushed by saltwater at extreme high tides (figure 7). The land is separated from the beach by an elevated sandspit. One end of the spit is low enough to allow water passage during extreme high tides. The ground generally is soft and

moist in the central portion of the site and becomes firmer and drier towards the spit and around the perimeter. Plants collected and identified indicate the influence of saltwater intrusion. Important saltwater marsh species include picleweed (Salicornia virginica); dodder (Cuscuta suksdorfii), a plant parasite on picleweed; orache (Atriple patula); ragweed (Ambrosia psilostachya); bentgrass (Agrostis

exarata); dunegrass (Elymus mollis); and meadow barley (Rordeum brachyantherum). Transition species include Pacific silverweed (Potentilla pacifica), red fescue (Festuca rubra) , and bearded fescue (cf. Festuca subulata) . Upland species grow on the spit and cuter perimeter. Nootka rose (Rosa nutkana) , yarrow (Achillea millefolium), and thistles (Cirsium vulgare) are the most prevalent upland species. A complete list of plants found at the Dugualla Bay site is provided by table 6. There are no trees in the marsh area or on the spit. The small plot of land appears to be quite productive and contains many plant species characteristic of salt marsh habitat.

TABLE 6

PLANTS FROM SITE No. 6 DUGUALLA BAY

Berberidaceae

Berberis aquifolium Pursh

Chenopodiaceae

Atriplex patula L.

Salicornia virginica L.

Compositae

Achillea millefolium L.

Ambrosia psilostachya DC.

Cirsium vulgare (Sav.) Tenore

Grindelia integrifolia DC.

Cuscutaceae

Cuscuta suksdorfii Yuncker

Gramineae

Agrostis exarata L.

Elymus mollis Trin.

Festuca rubra L.

Festuca subulata Trin.

Hordeum brachyantherum Nevski

Liliaceae - Crockett Lake roadside

Allium cernuum Roth

Rosaceae

Potentilla pacifica Howell

Rosa nutkana Presl.